

may sign the final settlement agreement.

4. The parties believe a stay of 60 days will allow adequate time for these steps to be completed, including for the Court to review the settlement to determine if it should be approved.

5. Accordingly, the Parties ask that the Court stay the current discovery schedule and all other deadlines for Plaintiffs and Defendant United States of America for 60 days.

WHEREFORE, the Parties jointly request that this Court grant their motion and stay further briefing and deadlines as to Plaintiffs' claims against Defendant United States of America.

Respectfully submitted,

April 22, 2024

/s/ Annie Prossnitz

STEPHEN WEIL*

IL Bar No. 6291062

Email: weil@loevy.com

ANAND SWAMINATHAN*

NY Bar No. 4511770

Email: anand@loevy.com

ANNIE PROSSNITZ

IL Bar No. 6336590

Email: prossnitz@loevy.com

LOEVY & LOEVY

311 N. Aberdeen

Chicago, Illinois 60607

(312) 243-5900

JOE A. SPENCER

TX Bar No. 18921800

Joe A. Spencer Attorney & Counselor at Law

/s/ Allison C. Reppond

Counsel for United States of America

ALLISON C. REPPOND

Email: Allison.Reppond@usdoj.gov

U.S. Attorney's Office for the Western
District of Louisiana

300 Fannin Street

Suite 3201

Shreveport, LA 71101

Office: 318-676-3600

*Attorney for Defendant United States of
America*

1009 Montana Ave.
El Paso, TX 79902
Office: (915) 532-5562
Email: Joe@joespencerlaw.com
Attorneys for Plaintiffs

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

D.A., A.A., and LUCINDA DEL CARMEN)
PADILLA-GONZALES,)
) **EP-22-CV-00295-FM**
Plaintiff,)
)
v.)
)
UNITED STATES OF AMERICA,)
)
Defendant.)

PROPOSED ORDER STAYING DISCOVERY

Pursuant to the Parties' joint motion to stay discovery after having reached a settlement in principle, IT IS HEREBY ORDERED that discovery and all accompanying deadlines are stayed in the above captioned case for 60 days.

Signed on the ____ day of _____ 2024, El Paso, Texas.

THE HONORABLE FRANK MONTALVO
SENIOR UNITED STATES DISTRICT JUDGE